



**John R. Kasich**, Governor  
**Mary Taylor**, Lt. Governor  
**Craig W. Butler**, Director

March 3, 2016

Ms. Mindy Cherng Clements  
Region 5 Superfund Emergency  
Response  
77 West Jackson Boulevard  
Chicago, IL 60604

**Re: Warren Steel Holdings  
General Correspondence  
RCRA C - Hazardous Waste  
Allen County  
OHR000007773**

**Subject: Warren Steel Holdings  
4000 Mahoning Avenue, Warren, Ohio, Trumbull County  
Time Critical Removal Action Request**

Dear Ms. Clements:

Ohio EPA requests U.S. EPA's assistance to investigate a property in Warren, Ohio, to assess the applicability of your time critical removal program with respect to abandoned hazardous wastes. Specifically, Warren Steel Holdings (WSH) has an industrial property located at 4000 Mahoning Avenue, Warren, Ohio (Facility) confirmed by Ohio EPA to have hazardous wastes that are presently being stored by the owners/operators since they abandoned the property. The week of January 18, 2016, through our Attorney General's Office (AGO), Ohio EPA filed a temporary restraining order (TRO) against WSH which generally requires WSH to provide site security, maintain/run the wastewater treatment plant and keep the electricity on (to run the wastewater treatment plant). Ohio EPA's TRO was unopposed and granted by the court. Ohio EPA returned Friday January 29, 2016, to seek a preliminary injunction to establish the same requirements and also seek access to the site to perform any remedial action which we may think is needed. WSH is not complying with this TRO, but Ohio EPA has been able to work with First Energy to keep power on at the Facility, and contracted with the former wastewater treatment plant operator to operate the wastewater treatment plant for the time being.

**Location and layout:**

The Facility is approximately 400 acres of relatively flat land. It is bounded on the north by the Warren Outerbelt, on the east by Mahoning Avenue, on the south by North River Road and the Mahoning River, and on the west by residential property. The site contains numerous buildings in various states of disrepair, most left over from when the property was owned and operated by Copperweld Steel Company (Copperweld). Most

of these buildings have been abandoned or demolished since Copperweld sold the property. While generally all abandoned buildings have had production equipment removed, many of the abandoned buildings contain equipment pits full of unknown liquids. Additionally, several businesses own or lease portions of the property and some access their businesses through WSH's main gate.

### **Site History:**

This site was a steel production facility that is now closed. When in operation it manufactured various sizes of solid steel billets primarily from scrap steel. Varieties of scrap steel were purchased from Tube City. The Facility operated 24 hours per day, 5 days per week and utilized a 100-ton capacity electric arc furnace. WSH employed approximately 180 people.

### **Sampling:**

- Ohio EPA conducted a preliminary sampling event at the Facility. Specifically, waste piles located in the rear of the Facility were sampled. The sample results were below TCLP for metal constituents found in OAC rule 3745-51-24. However, some of results did show elevated levels of chromium and cadmium.
- The listed hazardous waste electric arc furnace (EAF) dust (K061, as described in OAC rule 3745-51-31) stored in roll-offs at the Facility was also sampled. The sample result demonstrated lead at a concentration of 18.8ml/L per TCLP.
- Slag, caster cooling water, lime/crane dust, and drop-out box waste was also sampled. The sample results were below TCLP for metal constituents found in OAC rule 3745-51-24.

### **Hazardous Waste and Waste at Facility:**

As already alleged by U.S. EPA and Ohio EPA as a result of inspections at the Facility, WSH disposed of listed hazardous waste, EAF dust (K061), at the site. Additionally, there are 9 ~25 cubic yard roll-offs of K061 at the Facility being unlawfully stored and K061 also remains in the baghouse system. Ohio EPA observed the following wastes/materials which have been abandoned by WSH at the site:

- Four surface impoundments associated with the Facility's wastewater treatment system which contains accumulated sludge from pretreatment of on-site storm water and storm water.
- 12 inch mill Building – 2 Transformers (possibly containing PCBs), approximately 10 55-gallon drums of abandoned chemicals
- West of Ohio Star Forge business, outside open area - multiple transformers (possibly containing PCBs), might be leaking



- 36 inch mill Building – PCB Oil pit
- East of Caster building and North of Melt shop building – Super sacks of unknown product, 55-gallon containers of unused oil
- East end of Caster Bldg. Outside – 3 totes (approximately 200 gallons) of unknown material
- Water Treatment Bldg. Outside – Tote (200 gallons) of sulfuric acid
- Driveway to WWTP (south side) Several transformers (possibly containing PCBs)
- Waste Water Treatment Plant (inside) – several containers of chemicals used for WWTP
- Multiple buildings, including Mill Buildings, and buildings known as Shed 1, 2 and 3, - Pits containing liquid, most likely used oil,
- 21 inch mill Building- 2 ½ 55-gallon containers of aerosol cans
- East of Caster building and North of Melt shop building - Tote (approximately 200 gallons) of used oil
- Driveway to WWTP (south side) – 2-approximately 1000 gallon tanks marked with words used oil
- 2 ½ drums of ignitable hazardous waste (D001, as described in OAC rule 3745-51-21) aerosol cans in the 21 inch mill at the east end

There is a potential for releases and environmental contamination from the surface impoundments if the wastewater treatment unit fails/stops operating, dispersal of fugitive EAF dust around and possibly from the baghouse, from the undetermined wastes in piles around the Facility, transformers, used oil tanks, petroleum tanks, and from the water and wastewater treatment chemical containers.

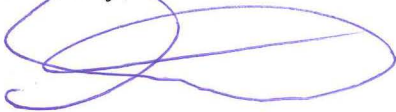
#### **Site Security/Vandalism:**

The risk for vandalism at the Facility is high given that the property is not well secured. Both humans and animals can access the site from many locations. The shared entrance brings traffic from the other businesses through the site without barriers to the waste locations. The pits in the abandoned buildings and undetermined piles/wastes are easily accessible to any wandering persons or animals.

**Conclusion:**

I hereby request that U.S. EPA conduct site investigations to assess the applicability of a time critical removal at 4000 Mahoning Avenue, Warren, Ohio. Ohio EPA requests that it be notified of any activities conducted at these sites. Ohio EPA also requests that U.S. EPA pursue revenue recovery from WSH or other liable parties to ensure the cleanup of the wastes resulting from WSH's violations is not a free service from U.S. EPA. If you have any related questions, or require any additional information, please contact Sherry Slone of Ohio EPA's Northeast District Office at 330-963-1226, or myself at 614-644-2953.

Sincerely,



Mitch Mathews  
Compliance Assurance Section – Hazardous Waste, Manager  
Division of Materials and Waste Management

MM/TH/sh

Cc: Joe Fredle, On-Scene Coordinator, U.S. EPA, Westlake Office

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